

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	Criminal No. 18-150(1) (DWF/HB)
)	
v.)	
Plaintiff,)	
)	DEFENDANT'S MOTION FOR
MICHAEL HARI,)	SPECIFIC DISCOVERY
)	
Defendant.)	

Michael Hari, through his attorneys, Shannon Elkins and Reynaldo A. Aligada, Jr., hereby moves the Court pursuant to Rule 16 (a)(1)(B) and E (iii) of Federal Rules of Criminal for any information taken from Michael Hari in violation of his Constitutional rights under the Fifth and Sixth Amendments and his attorney-client privilege.

Michael Hari has been at the Anoka County Jail since March 2019, and has had court-appointed counsel from the Office of the Federal Defender since March of 2018. In recent weeks, it has come to the attention of Mr. Hari's undersigned counsel that staff at the Anoka County Jail may be reviewing and copying documents in Mr. Hari's possession, including Mr. Hari's attorney-client correspondence, and notes for his attorneys. It is unknown if any of these materials – which are subject to the attorney-client privilege – have been provided to the United States Attorney's Office, United States Marshals or any other member of federal or state law enforcement.

Accordingly, Mr. Hari hereby moves the Court to order the government to immediately disclose and make available for inspection, copying and photographing, the following information:

1. Any and all written communications, including, but not limited to any email communications between the Anoka County Sheriff's Office or Anoka County Jail staff and any federal prosecutor or law enforcement officer regarding documents in Michael Hari's possession,
2. Any and all Anoka County Sheriff's Office training materials, written policies and procedures regarding the searching, copying, monitoring or screening of inmate property or inmate mail, and
3. Any and all written complaints received by the Anoka County Sheriff's Office or the Anoka County Jail from January 1, 2019, to the present regarding the improper screening, reading, copying, or dissemination of inmate documents or inmate mail.

Dated: July 18, 2019

Respectfully submitted,

s/ Shannon Elkins

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s/ Reynaldo A. Aligada, Jr.

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